

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**Philip Wilkinson and Pam Reed,
individually and on behalf of a class or
classes of all others similarly situated**

Plaintiffs

V.

Cause No. 3:11-cv-01115-N

**BDO USA, LLP, BDO International
Ltd., BDO Global Coordination B.V.,
and Brussels Worldwide Services
BVBA,**

Defendants

UNOPPOSED MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME PHILIP WILKINSON AND PAM REED (“Plaintiffs”) and, through their counsel of record, file this Unopposed Motion to Dismiss with Prejudice and in support hereof respectfully show the Court as follows:

I.

Pursuant to the Settlement Agreement approved by Order entered on September 23, 2015, which requires dismissal of this case with prejudice as a condition to BDO USA LLP's obligation to pay the Settlement Amount, Plaintiffs respectfully request that all claims and causes of action asserted herein or that could have been asserted herein be dismissed with prejudice to the refiling of same and with costs and fees taxed against the party incurring same. Defendants do not oppose this motion as reflected by the signature of their counsel on the proposed Order.

PRAYER

WHEREFORE, PREMISES CONSIDERED, it is respectfully requested that the Court enter the Agreed Order granting this Unopposed Motion to Dismiss with Prejudice, that the fees and the costs of suit be taxed to the party incurring the same, and for such other relief as the Court deems proper.

Dated: November 24, 2015

Respectfully submitted,

NELIGAN FOLEY LLP

/s/ Douglas J. Buncher
Douglas J. Buncher
Texas State Bar No. 03342700
dbuncher@neliganlaw.com

325 N. S. Paul, Suite 3600
Dallas, Texas 75201
Telephone: (214) 840-5300
Facsimile: (214) 840-5301

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that on the 24th day of November, 2015, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF System under Local Rule CV-5.1(d). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ Douglas J. Buncher
Douglas J. Buncher

CERTIFICATE OF CONFERENCE

This will certify that I conferred with counsel for Defendants regarding the filing of this Motion, and Defendants are unopposed to the relief requested, as the filing of this Motion and entry of the requested Agreed Order is required by the Settlement Agreement approved by the Court by Order entered on September 23, 2015.

/s/ Douglas J. Buncher

Douglas J. Buncher

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